

EXHIBIT

“A”

L00140383004080218

LAW OFFICES OF JONATHAN WHEELER, P.C.
 BY: Jonathan Wheeler, Esquire
 Attorney I.D. No.: 12649
 One Penn Center - Suite 1270
 1617 JFK Boulevard
 Philadelphia, PA 19103
 (215) 568-2900



ROBERT WEINSTEIN
 1515 Hampton Road
 Rydal, PA 19046

v.

NATIONWIDE MUTUAL INSURANCE
 COMPANY
 1 Nationwide Plaza
 Columbus, OH 43218-2166

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY

JUNE TERM, 2018

NO.: 02607

Major Case
 Jury Trial Waived

CIVIL ACTION COMPLAINT (1C - Contract)**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE, IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
 Lawyer Referral Service
 1101 Market St., 11th Floor
 Philadelphia, PA 19107-2911
 Telephone: 215-238-6333
 Fax: 215-238-1159

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra suya persona. Señalado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades, u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELPHIA
 Servicio De Referencia E Informacion Legal
 1101 Market Street, 11th Floor
 Filadelfia, Pennsylvania 19107
 (215) 238-6333

Case ID: 180602607

L00140383005080218

LAW OFFICES OF JONATHAN WHEELER, P.C.

BY: Jonathan Wheeler, Esquire

Attorney I.D. No.: 12649

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(215) 568-2900

E-Mail: jwheeler@jwheelerlaw.com

Attorney for Plaintiff(s)

ROBERT WEINSTEIN

1515 Hampton Road

Rydal, PA 19046

v.

NATIONWIDE MUTUAL INSURANCE

COMPANY

1 Nationwide Plaza

Columbus, OH 43218-2166

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

JUNE TERM, 2018

NO.: 02607

Major Case
Jury Trial Waived

CIVIL ACTION COMPLAINT (1C - Contract)

1. Plaintiff, Robert Weinstein, is an adult individual residing at that address set forth above.

2. Defendant, Nationwide Mutual Fire Insurance Company ("Nationwide"), is a corporation duly organized and existing which is authorized to conduct business as an insurance company within the Commonwealth of Pennsylvania and maintains a place of business for that purpose at the address set forth above.

3. Defendant, in its regular course of business issued to Plaintiff a policy of insurance ("the Policy") covering Plaintiffs' property located at 319 N. 11th Street, Philadelphia, PA 19107 ("the Property"). A true and correct copy of the declarations page of said policy is attached hereto and incorporated herein as Exhibit "A".

Case ID: 180602607

L00140383006080218

4. On or about June 27, 2017, while the Policy was in full force and effect, Plaintiff suffered direct physical loss and damage to the insured Property believed to be the result of a peril insured against under the Policy, to wit, fire and related perils resulting in damage to the insured premises in an amount in excess of \$250,000.00.

5. Notice of this covered loss was given to Defendant in a prompt and timely manner and Plaintiff, at all relevant times, fully complied with all of the terms and conditions required by the Policy.

6. Defendant, despite demand for benefits under the Policy, has refused, without legal justification or cause, and continues to refuse, to pay to Plaintiff monies owed for the damages suffered as a result of the Loss.

7. Solely as a result of Defendant's failure and refusal to pay benefits to Plaintiff as required under the Policy, Plaintiff has suffered loss and damage in an amount in excess of \$50,000.00.

**COUNT I
In Assumpsit - Breach of Contract**

8. Plaintiff incorporates by reference the facts and allegations contained in the foregoing paragraphs as though fully set forth hereinafter at length.

9. Defendant is obligated by the terms of the contract to indemnify Plaintiff's loss.

10. Despite submission of reasonable proof and demand for full and complete payment with respect to Plaintiffs Loss, Defendant has not paid to Plaintiff all of the policy benefits to which they are entitled under the Policy.

11. Defendant's denial of coverage was made without a reasonable basis in fact.

12. Defendant's refusal to indemnify Plaintiffs loss constitutes a breach of the

Case ID: 180602607

L00140383007080218

insurance contract.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount in excess of \$50,000.00 together with interest, court costs and damages for delay.

COUNT II
In Trespass - 42 Pa.C.S.A. §8371

13. Plaintiff incorporates by reference the facts and allegations contained in the foregoing paragraphs as though fully set forth hereinafter at length.

14. Defendant has engaged in bad faith conduct toward Plaintiff with respect to its adjustment of Plaintiffs' covered Loss, in violation of 42 Pa.C.S.A. §8371 et seq.

15. In furtherance of its bad faith and wrongful denial and refusal to pay benefits for Plaintiffs covered Loss, Defendant, acting by and through its duly authorized agents, servants, workmen or employees, including, but not limited to, Jeff Gilchrist, has engaged in the following conduct:

a. in denying benefits to plaintiff for the repair and replacement of the elevator in the premises when he knew that the elevator parts were not available and required installation of a new elevator; for the sole purpose of depriving plaintiff of benefits which he knew were due and owing under the policy of insurance;

b. in failing to complete a prompt and thorough investigation of Plaintiffs claim before representing that such claim is not covered under the Policy;

c. in failing to pay Plaintiffs covered loss in a prompt and timely manner;

d. in failing to objectively and fairly evaluate Plaintiffs claim;

e. in conducting an unfair and unreasonable investigation of Plaintiffs claim;

f. in asserting Policy defenses without a reasonable basis in fact;

Case ID: 180602607

L00140383008080218

- g. in flatly misrepresenting pertinent facts or policy provisions relating to coverages at issue and placing unduly restrictive interpretations on the Policy and/or claim forms;
- h. in failing to keep Plaintiff or their representatives fairly and adequately advised as to the status of the claim;
- i. in unreasonably valuing the loss and failing to fairly negotiate the amount of the loss with Plaintiffs or their representatives;
- j. in failing to promptly provide a reasonable factual explanation of the basis for the denial of Plaintiffs claim;
- k. in unreasonably withholding policy benefits;
- l. in acting unreasonably and unfairly in response to Plaintiffs claim;
- m. in unnecessarily and unreasonably compelling Plaintiff to institute this lawsuit to obtain policy benefits for a covered loss, that Defendant should have paid promptly and without the necessity of litigation.

16. For the reasons set forth above, Defendant has acted in bad faith in violation of 42 Pa.C.S.A. §8371, for which Defendant is liable for statutory damages including interest from the date the claim was made in an amount equal to the prime rate of interest plus three percent, court costs, attorneys' fees, punitive damages, and such other compensatory and/or consequential damages as are permitted by law.

WHEREFORE, Plaintiff demands judgment against Defendant in an amount in excess of \$50,000.00, together with interest, court costs, counsel fees and damages for delay.

LAW OFFICES OF JONATHAN WHEELER, P.C.

BY: /s/Jonathan Wheeler
JONATHAN WHEELER, ESQUIRE
Attorney for Plaintiff(s)

Case ID: 180602607

L00140383009080218

Verification to Complaint

VERIFICATION

The undersigned hereby states that he is the plaintiff in this action and that the statements of fact made in the foregoing document are true and correct to the best of his information and belief. The undersigned understands that the statements herein are made subject to the penalties of 18 Pa. Cons. Stat. Ann. § 4904 relating to unsworn falsification to authorities.



ROBERT WEINSTEIN

DATE: 7/18/17

Case ID: 180602607

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EXHIBIT “A”

Case ID: 180602607

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PAGE 04



NATIONWIDE MUTUAL FIRE INSURANCE COMPANY
ONE NATIONWIDE PLAZA
COLUMBUS, OH 43215-2220

RENEWAL

DECLARATIONS

Policy Number:	ACP CPPF 5402988733	COMMERCIAL PROPERTY
Named Insured:	WEINSTEIN, ROBERT	
Mailing Address:	1515 HAMPTON RD RYDAL PA 15046-1212	
Agent:	RICHARD D ZEISES	
Address:	JENKINTOWN PA 19046	
Producer:	RICHARD DEAN ZEISES	
Policy Period:	This policy is effective from 02/10/18 to 02/10/18 12:01 A.M. Standard time at the above mailing address.	

This policy is subject to the following forms. Forms specific to a certain building or item can be found with the specific building and item information on the following pages.

FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP0010	1012	0	CP0090	0788	0	CP0140	0706	0
CP1270	0996	0	CP7132	0416	0	IL0017	1198	0
IL0935	0702	0	IN7809	1115	0	LI0995	0107	0
CP7117	0415	0	CP7118	0415	0			

Mortgagee and loss payee information - See schedules CP-DM and CP-DL

Replacement or
Renewal Number ACP CPP 5402988733
A PACKAGE MODIFICATION FACTOR HAS BEEN APPLIED

Countersigned _____ By _____
Date _____ Authorized Representative _____

Premium for Certified Acts of Terrorism \$ 0.00
Total Annual Premium \$ 18,854.00

Total Policy Premium \$ 18,854.00

CP-D (10-88)	DIRECT BILL EJE086 10036	INSURED COPY	ACP CPPF 5402988733	977298211	34	000548X
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Case ID: 180602607

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PAGE 05

NATIONWIDE MUTUAL FIRE INSURANCE COMPANY

COMMERCIAL PROPERTY SCHEDULE REFERENCE PAGE

Policy Number: ACP CPPF 5402988733

Policy Period: From 02/10/18 To 02/10/18

Named Insured: WEINSTEIN, ROBERT

Loc. Bld. Item	Address/Description	Limit	Premium
	TOTAL POLICY PREMIUM	\$ 18,854.00	
	POLICY WIDE OPTIONAL COVERAGES		
	PROTECTION PLUS	\$ 1,307.00	
	EQUIPMENT BREAKDOWN	\$ 1,212.00	
1	319 N 11TH ST # 325 PHILADELPHIA PA Protection Class: 01		
1	REAL ESTATE		
1	BUILDING	\$ 8,756,200	\$ 4,156.00
	GROUP 1	\$	3,007.00
	GROUP 2	\$	5,571.00
	SPECIAL - CAUSE OF LOSS		
2	2 BUSINESS INCOME INCLUDING GROUP 1 GROUP 2 SPECIAL - CAUSE OF LOSS	\$ 250,000	\$ 125.00 \$ 113.00 \$ 393.00
2	125 N 11TH ST PHILADELPHIA PA Protection Class: 01		
1	NO DESCRIPTION AVAILABLE		
1	BUILDING	\$ 1,269,200	\$ 749.00
	GROUP 1	\$	901.00
	GROUP 2	\$	
	SPECIAL - CAUSE OF LOSS		1,320.00

CP-DR (10-89)

LIGG 180602

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Case ID: 180602607

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PAGE 06

NATIONWIDE MUTUAL FIRE INSURANCE COMPANY

COMMERCIAL PROPERTY SCHEDULE

Policy Number: ACP CPPF 5402988733

Policy Period: From 02/10/18 To 02/10/18

Named Insured: WEINSTEIN, ROBERT

Policy Wide Declaration Coverage

Protection Plus Coverage-GOLD Premium \$ 1,307.00

xxxx Premise No 01 xxxx Total Premium \$ 13,365.00

Address: 319 N 11TH ST # 325 State: PA Zip Code: 19107-1300
City: PHILADELPHIA

Description: REAL ESTATE

FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP7115	0803	0	IL0166	0907	0	IL0172	0907	0
IL0296	0907	0	IL0910	0702	0	IL0952	0115	0
IN7404	0107	0						

** Building No 01 ** Total Premium \$ 13,365.00

Protective Safeguards
P-1 Automatic Sprinkler System
Rental PropertyOccupancy Group - INDUSTRY & PROCESS
Description: REAL ESTATE
Construction Type: JOISTED MASONRY

FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP1034	1012	0	CP7301	0715	0	IN7854	0717	0

Cov erages Provided

Item	Coverage	Limit of Insurance	Causes of Loss Form	Coinsurance	Deductible	Premium
01	BUILDING	\$ 8,756,200	SPECIAL	100%	5000	12,734.00

Description: BUILDING

Optional Coverages:
Replacement Cost
Inflation Guard 2%

FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP1030	1012	0						

CP-DS (10-89)

LIGG 10036

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ACP CPPF 5402988733 977289211 34 D005482

Case ID: 180602607

L00140383014080218

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PAGE 07

NATIONWIDE MUTUAL FIRE INSURANCE COMPANY

COMMERCIAL PROPERTY SCHEDULE

Policy Number: ACP CPPF 5402988733

Policy Period: From 02/10/18 To 02/10/19

Named Insured: WEINSTEIN, ROBERT

Item	Coverage	Limit of Insurance	Causes of Loss Form	Coincurrence	Deductible	Premium		
02	BUS INCOME #	250,000	SPECIAL	80%	72 HR	631.00		
Description: BUS INCOME INCL EXTRA EXP								
Optional Coverages:								
Business Income Including Rental Value								
FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP0030	1012	0	CP1030	1012	0			

CP-DS (10-88)

LI3G 10036

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ACP CPPF 5402988733 977298211 34 0005483

Case ID: 180602607

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PAGE 08

NATIONWIDE MUTUAL FIRE INSURANCE COMPANY

COMMERCIAL PROPERTY SCHEDULE

Policy Number: ACP CPPF 6402988733

Policy Period: From 02/10/18 To 02/10/19

Named Insured: WEINSTEIN, ROBERT

			Premise No	02	xxxx	Total Premium \$	2,970.00	
Address: 125 N 11TH ST City: PHILADELPHIA			State: PA			Zip Code: 19107-2302		
Description: REAL ESTATE								
FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP7115	0803	0	IL0166	0907	0	IL0172	0907	0
IL0266	0907	0	IL0910	0702	0	IL0952	0115	0
INT7404	0107	0						
xx Building No 01 xx Total Premium \$								2,970.00
Protective Safeguards P-1 Automatic Sprinkler System Rental Property								
Occupancy Group - APART & CONDOS Description: Construction Type: JOISTED MASONRY								
FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP1034	1012	0	CP7301	0715	0	INT7854	0717	0
Cov coverages Provided								
Item	Coverage	Limit of Insurance	Causes of Loss Form	Coinsurance	Deductible	Premium		
01	BUILDING	\$ 1,269,200	SPECIAL	100%	5000	2,970.00		
Description:BUILDING								
Optional Coverages: Replacement Cost								
FORM	DATE	PREM	FORM	DATE	PREM	FORM	DATE	PREM
CP1030	1012	0						

CP-DS (10-80)

LIGG 18036

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ACP CPPF 6402988733 077298211 34 0005494

Case ID: 180602607

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PAGE 09

NATIONWIDE MUTUAL FIRE INSURANCE COMPANY

COMMERCIAL PROPERTY SCHEDULE OF MORTGAGEES

Policy Number: ACP CPPF 5402988733

Policy Period: From 02/10/18 To 02/10/19

Named Insured: WEINSTEIN, ROBERT

MORTGAGEE INFORMATION

001 FIRSTRUST BANK ISA0A/ATIMA
1 WALNUT GROVE DR
HORSHAM PA 190442201
Location: 001 Building: 001 Item: 001
Loan No.:
Interest: LOC 1-1

CP-DM (02-93)

LJ96

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ACP CPPF 5402988733 077298211 34 0006485

Case ID: 180602607

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PAGE 10

NATIONWIDE MUTUAL FIRE INSURANCE COMPANY

COMMERCIAL PROPERTY SCHEDULE OF MORTGAGEES

Policy Number: ACP CPPF 5402988733

Policy Period: From 02/10/18 To 02/10/19

Named Insured: WEINSTEIN, ROBERT

MORTGAGEE INFORMATION

001 FIRSTRUST BANK ISA0A/ATIMA
1 WALNUT GROVE DR
HORSHAM PA 190442201
Location: 002 Building: 001 Item: 001
Loan No.:
Interest: LOC 2-1

002 WELLS FARGO BANK NA
PO BOX 6995
PORTLAND OR 972286995
Location: 002 Building: 001 Item: 001
Loan No.:
Interest: LOC 2-1

CP-DM (02-93)

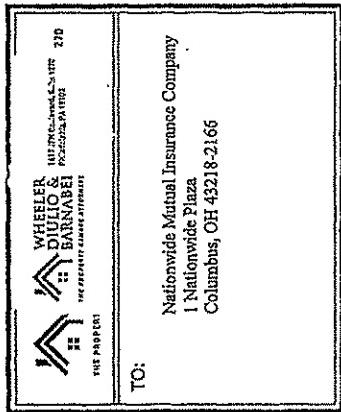
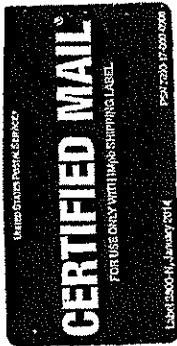
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Case ID: 180602607

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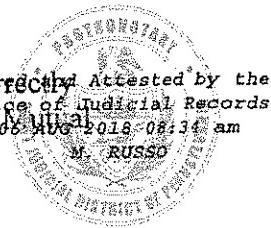


EXHIBIT

“B”

Bradley J. Vance, Esquire
Attorney I.D.#58850
REGER RIZZO & DARNALL LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
(215) 495-6500
(215) 496-6600
bvance@regerlaw.com

Attorney for Defendant,
Nationwide Mutual Fire
Insurance Company, incorrectly Attested by the
designated as Nationwide Insurance Company



ROBERT WEINSTEIN	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
v.	:	JUNE TERM, 2018
NATIONWIDE MUTUAL	:	CASE NO. 02607
INSURANCE COMPANY	:	
Defendant,	:	

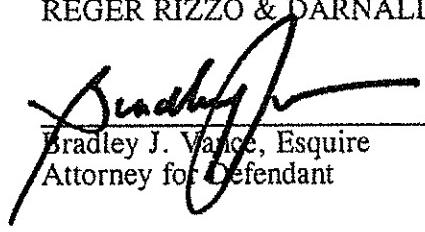
ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Defendant, Nationwide Mutual Fire Insurance Company, incorrectly designated as Nationwide Mutual Insurance Company regarding the above-captioned matter.

REGER RIZZO & DARNALL LLP

By:



Bradley J. Vance, Esquire
Attorney for Defendant

Dated: 8-6-18

Bradley J. Vance, Esquire
Attorney I.D.#58850
REGER RIZZO & DARNALL LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
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byance@regerlaw.com

Attorney for Defendant,
Nationwide Mutual Fire
Insurance Company, incorrectly
designated as Nationwide Mutual
Insurance Company

ROBERT WEINSTEIN	:	COURT OF COMMON PLEAS
Plaintiff,	:	PHILADELPHIA COUNTY
v.	:	JUNE TERM, 2018
	:	CASE NO. 02607
NATIONWIDE MUTUAL	:	
INSURANCE COMPANY	:	
Defendant,	:	

CERTIFICATE OF SERVICE

I, Bradley J. Vance, Esquire, attorney for Nationwide Mutual Fire Company incorrectly designated as Nationwide Mutual Insurance Company hereby certify that a true and correct copy of my Entry of Appearance was served on August 6, 2018 via United States First Class Mail and/or Electronic Mail to all counsel and unrepresented parties.

REGER RIZZO & DARNALL LLP

Date:

By: /s/ Bradley J. Vance
Bradley J. Vance, Esquire

EXHIBIT

“C”

Bradley J. Vance, Esquire
Attorney I.D.#58850
REGER RIZZO & DARNALL LLP
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2929 Arch Street
Philadelphia, PA 19104
(215) 495-6500
(215) 496-6600
bvance@regerlaw.com

Attorney for Defendant,
Nationwide Mutual Fire
Insurance Company, incorrectly
designated as Nationwide Mutual
Insurance Company

ROBERT WEINSTEIN	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
Plaintiffs,		:
	:	
	:	
v.	:	JUNE TERM, 2018
	:	CASE NO. 02607
NATIONWIDE MUTUAL INSURANCE	:	
COMPANY	:	
	:	
Defendants,		:

NOTICE OF FILING OF NOTICE OF REMOVAL

To: Prothonotary
Philadelphia County

Jonathan Wheeler, Esquire
Law Offices of Jonathan Wheeler, P.C.
One Penn Center, Suite 1270
1617 JFK Blvd.
Philadelphia, PA 19103

PLEASE TAKE NOTICE that on August 7, 2018, pursuant to 28 U.S.C. §§1332, 1441, 1446, Defendant filed a Notice of Removal for the above-captioned action from Court of Common Pleas of Philadelphia County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania. A copy of the Notice of Removal is attached hereto as Exhibit "1".

REGER RIZZO & DARNALL LLP

Date:

By:

Bradley J. Vance, Esquire
Attorney for Defendant

Bradley J. Vance, Esquire
Attorney I.D.#58850
REGER RIZZO & DARNALL LLP
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(215) 496-6600
[bvance@regerlaw.com](mailto: bvance@regerlaw.com)

Attorney for Defendant,
Nationwide Mutual Fire
Insurance Company, incorrectly
designated as Nationwide Mutual
Insurance Company

ROBERT WEINSTEIN : COURT OF COMMON PLEAS
Plaintiff, : PHILADELPHIA COUNTY
: :
v. : JUNE TERM, 2018
: CASE NO. 02607
NATIONWIDE MUTUAL :
INSURANCE COMPANY :
Defendant, :

CERTIFICATE OF SERVICE

I, Bradley J. Vance, Esquire, attorney for Nationwide Mutual Insurance Company hereby certify that a true and correct copy of the within Notice of Removal was served upon all counsel listed below via E-Mail and/or First-Class Mail, postage prepaid:

Jonathan Wheeler, Esquire
Law Offices of Jonathan Wheeler, P.C.
One Penn Center, Suite 1270
1617 JFK Blvd.
Philadelphia, PA 19103
jwheeler@jwheelerlaw.com

REGER RIZZO & DARNALL LLP

Date:

By:

Bradley J. Vance, Esquire
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2929 Arch Street
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(215) 495-6500
Attorney for Defendant